UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS	
MASSACHUSETTS DEVELOPMENT ) FINANCE AGENCY ) Plaintiff, )	MAR 23 P 12: 0 - LINTAIDT COURT LINTAIDT OF MASS.
v. )	C.A. No. 04 CV 10203 PBS
ADP MARSHALL, INC., a FLUOR  DANIEL COMPANY, and FIREMAN'S  FUND INSURANCE COMPANY  Defendants.  )	
ADP MARSHALL, INC.  Plaintiff-in-Counterclaim, )	FILING FEE PAID: RECEIPT #
v. )  MASSACHUSETTS DEVELOPMENT )  FINANCE AGENCY )  Defendant-in-Counterclaim. )	BY DPTY CLK DATE 4/2/4/14
ADP MARSHALL, INC.  Third Party Plaintiff,	
v. )	
ALLIED CONSULTING ENGINEERING ) SERVICES, INC., ANDOVER CONTROLS) CORPORATION, R&R WINDOW ) CONTRACTORS, INC., and DELTA )	

## **MOTION FOR ADMISSION PRO HAC VICE**

KEYSPAN, INC. n/k/a DELTA

Third Party Defendants.

KEYSPAN, LLC

Pursuant to Local Rule 83.5.3(b), the undersigned, a member in good standing of the bar of this Court, requests the Court to admit Glenn H. Haese *pro hac vice* to represent the Defendants, ADP Marshall, Inc. ("ADPM") and Fireman's Fund Insurance Company

("Fireman") in the above-captioned matter. In support of this motion, the undersigned asserts that this application is made for good cause and the following:

- 1. Glenn H. Haese is an attorney associated with the firm Haese, LLC. The office addresses of Haese, LLC, are 100 Pearl Street, 14th Floor, Hartford, Connecticut 06103 and 70 Franklin Street, 9<sup>th</sup> Floor, Boston, MA 02110.
  - 2. Attorney Haese is a member in good standing of the following courts:

State of Colorado U.S. District Court (Colorado) U.S. Court of Appeals (4<sup>th</sup> and 5<sup>th</sup> Circuits)

- 3. Attorney Haese does not have any grievances currently pending against him, and has never been reprimanded, suspended, placed on inactive status, disbarred or resigned from the practice of law.
- 4. Attorney Haese is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

Respectfully submitted,

22 April 2004

DEFENDANTS,

ADP Marshall, Inc. and Fireman's Fund Insurance Company By their attorneys,

Andrew J. Tine (BBO#633639)

Richard Fox (BBO#651173)

Haese, LLC

70 Franklin Street, 9th Floor

Boston, MA 02110

(617) 428-0266 - Telephone

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## CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing motion via United States Mail postage prepaid this 22° day of April, 2004 to the following:

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